UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

COLONIAL PIPELINE COMPANY)
Plaintiff))
) Case No. 3:20-cv-00666
v.)
) Judge William L. Campbell, Jr.
METROPOLITAN NASHVILLE) Magistrate Judge Alistair E. Newbern
AIRPORT AUTHORITY; and) JURY DEMAND
AECOM TECHNICAL SERVICES, INC.)
)
Defendants)

PLAINTIFF'S MOTION TO CONSOLIDATE

Pursuant to Federal Rule of Civil Procedure 42, Colonial Pipeline Company moves to consolidate this case and *Metropolitan Nashville Airport Authority v. Colonial Pipeline Co.*, Case No. 3:20-cv-00809, both pending in this Court. As set forth in the Memorandum accompanying this Motion, the cases share common factual and legal issues, and consolidation is warranted because it will eliminate the risk of inconsistent adjudications of common factual and legal issues, decrease the burden and expense on parties, witnesses, and the court, promote judicial economy, and not cause any prejudice or delay.

In accordance with Local Rule 7.01, Colonial's counsel conferred with MNAA's and AECOM's counsel before filing this motion, and both stated they intend to oppose the motion.

Respectfully submitted,

s/ Brian M. Dobbs

L. Wearen Hughes (BPR No. 5683)
J. Andrew Goddard (BPR No. 6299)
Brian M. Dobbs (BPR No. 25855)
Bass, Berry & Sims PLC
150 3rd Ave. S., Suite 2800
Nashville, TN 37201
(615) 742-6200
whughes@bassberry.com
dgoddard@bassberry.com
bdobbs@bassberry.com

Attorneys for Plaintiff and Counter-Defendant Colonial Pipeline Company

CERTIFICATE OF SERVICE

I certify that I filed this document electronically using the Court's electronic case management system, which will send notice to:

Paul S. Davidson
Edward Callaway
Michael C. Brett
Waller Lansden Dortch & Davis LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
paul.davidson@wallerlaw.com
ed.callaway@wallerlaw.com
mike.brett@wallerlaw.com

Attorneys for Defendant and Counter-Claimant Metropolitan Nashville Airport Authority

Gary C. Shockley
Caldwell G. Collins
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
211 Commerce Street
Nashville, TN 37201
gshockley@bakerdonelson.com
cacollins@bakerdonelson.com

Attorneys for Defendant AECOM Technical Services, Inc.

s/ Brian M. Dobbs
Brian M. Dobbs